

Marquiz Law Office
Professional Corporation

3088 Via Flaminia Court
Henderson, NV 89052
Phone: (702) 263-5533
Fax: (702) 263-5532
Craig A. Marquiz, Esq.
NV Bar #7437
MarquizLaw@cox.net

Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOSEPH O'SHAUGHNESSY, et al.
Plaintiffs,

v.

UNITED STATES OF AMERICA,
Defendants.

Case No.: 2:22-cv-01039-WQH-EJY

TODD C. ENGEL,

Plaintiff,

v.

UNITED STATES OF AMERICA,
Defendants.

Case No.: 2:22-cv-01040-WQH-EJY

**STIPULATION TO EXTEND
DEADLINE FOR FILING THE
PARTIES' PROPOSED DISCOVERY
PLAN**

(First Request)

Plaintiffs Joseph O'Shaughnessy, Jason D. Woods, Mel Bundy and Dave Bundy (hereinafter the "Tier 2 Plaintiffs") and the Bundy Family Members (i.e., Marylynn Bundy, Briana Bundy, Brett Roy Bundy, Maysa Lynn Bundy, Dally Anne Bundy, Bronco Cliven Bundy, Payton Alma Bundy, Piper Bodel Bundy, Montana Bundy, Bentile Bundy, Presly Bundy, Kymber Bundy and Adahlen Bundy) hereinafter collectively "the O'Shaughnessy Plaintiffs," Todd Engel ("Engel" - the Related Action Plaintiff) and the United States of America ("USA"), by and

through their respective counsel of record hereby move the Court to extend the deadlines for the parties to file a Joint Discovery Plan by eight (8) days to February 9, 2024.

Counsel for the United States, Neil Singh, lead counsel for defense in the Engel case, suffered a death in his family and is out all this week. The parties have been conferring in good faith regarding the production of a joint discovery plan and a protective order, among other issues, to address with the Court at a Case Management Conference to be scheduled. The parties ask for the Court's permission to submit their discovery plan and proposed scheduling order on or before February 9, 2024.

RESPECTFULLY SUBMITTED this 30th day of January, 2024.

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MERRICK GARLAND
United States Attorney General

By: /s/ Craig A. Marquiz, Esq.
Craig A. Marquiz, Esq.
3088 Via Flaminia Court
Henderson, NV 89052
Counsel for Plaintiffs

By: /s/ Brock Heathcotte, Esq.
Brock Heathcotte, Esq.
Neil Singh, Esq.
Special Assistant US Attorneys,
Acting Under Authority Conferred by
28 U.S.C. § 515
Counsel for Defendant United States

ORDER

Pursuant to Stipulation and good cause appearing,

IT IS ORDERED that the parties shall have through February 9, 2024 to submit their Discovery Plan & Scheduling Order.

Dated this ____ day of January, 2024.

United States District Court Judge